

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

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SCOTT TURNAGE , CORTEZ D. BROWN, )  
DEONTAE TATE, JEREMY S. MELTON, ISSACCA ) Case No. 2:16-cv-2907-  
POWELL, KEITH BURGESS, TRAVIS BOYD, ) SHM/tmp  
TERRENCE DRAIN, and KIMBERLY ALLEN on )  
behalf of themselves and all similarly situated persons, )  
)  
PLAINTIFFS, ) CLASS ACTION  
) COMPLAINT FOR  
) VIOLATIONS OF THE  
) CIVIL RIGHTS ACT OF  
) 1871, 42 U.S.C. § 1983,  
) TENNESSEE COMMON  
) LAW, DECLARATORY,  
) AND INJUNCTIVE RELIEF  
v. )  
BILL OLDHAM, in his individual capacity as former )  
Sheriff of Shelby County, Tennessee; FLOYD )  
BONNER, JR., in his official capacity as Sheriff of )  
Shelby County, Tennessee; ROBERT MOORE, in his )  
individual capacity as former Jail Director of Shelby )  
County, Tennessee; KIRK FIELDS, in his official )  
capacity as Jail Director of Shelby County, Tennessee; )  
CHARLENE McGHEE, in her individual capacity as )  
former Assistant Chief of Jail Security of Shelby )  
County, Tennessee; REGINALD HUBBARD, in his )  
official capacity as Assistant Chief of Jail Security of )  
Shelby County, Tennessee; DEBRA HAMMONS, in )  
her individual capacity as former Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; TIFFANY )  
WARD in her official capacity as Assistant Chief of Jail )  
Programs of Shelby County, Tennessee; SHELBY )  
COUNTY, TENNESSEE, a Tennessee municipality; )  
TYLER TECHNOLOGIES, INC., a foreign )  
corporation; GLOBAL TEL\*LINK CORPORATION, a )  
foreign corporation; SOFTWARE AG USA, INC., a )  
foreign corporation; and SIERRA-CEDAR, INC., a )  
foreign corporation, )  
DEFENDANTS. )

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**PLAINTIFFS' UNOPPOSED MOTION AND SUPPORTING MEMORANDUM FOR  
EXTENSION OF TIME TO RESPOND TO DEFENDANT GLOBAL TEL\*LINK  
CORPORATION'S MOTION TO DISMISS PLAINTIFFS' FIFTH AMENDED  
COMPLAINT**

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COME NOW Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, on behalf themselves and all similarly situated persons (hereinafter "the Plaintiffs"), by and through the undersigned counsel, and pursuant to Fed. R. Civ. P. 6 and 12 hereby move this Court to extend their time to respond to the Motion to Dismiss Plaintiffs' Fifth Amended Complaint (ECF No. 178) filed by Defendant Global Tel\*Link Corporation (hereinafter "GTL"). In support of their Motion, Plaintiffs state as follows:

**MEMORANDUM OF FACTS AND LAW IN SUPPORT OF MOTION**

1. Plaintiffs' deadline to respond to GTL's Motion to Dismiss (ECF No. 178) is April 23, 2019.
2. This is a complex class action lawsuit filed on behalf of the Plaintiffs. The Class Action Complaint has been amended previously five times.
3. Plaintiffs are preparing a new Sixth Amended Complaint. Defendant Sierra-Cedar, Inc. has alleged comparative fault against a non-party in its "Answer to Plaintiffs' Fifth Amended Class Action Complaint." Plaintiffs have sought leave from this Court to file an amended complaint naming Sierra Systems Group, Inc. as a new defendant, thereby rendering GTL's Motion to Dismiss moot.
4. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Plaintiffs consulted with counsel for GTL regarding this requested extension.
5. Counsel for GTL does not oppose this request for an extension of time to respond.

6. A proposed Order granting this Motion will be e-mailed to the Court for its consideration.

Therefore, Plaintiffs respectfully request that the Court extend their time to respond to GTL's Motion to Dismiss (ECF No. 178) the Fifth Amended Complaint by an additional week, or until April 30, 2019.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of April, 2019, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

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